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8
9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SANTA ROSA DIVISION**

12 In re:

13 LEFEVER MATTSON, a California
14 corporation, *et al.*¹

15 Debtors.

16 Lead Case No. 24-10545 (CN)

17 (Jointly Administered)

18 Chapter 11

19 **SUPPLEMENTAL DECLARATION
OF JOSH H. ESCOVEDO IN
SUPPORT OF APPLICATION OF
DEBTORS FOR ORDER
AUTHORIZING EMPLOYMENT OF
BUCHALTER, A PROFESSIONAL
CORPORATION, AS SPECIAL
LITIGATION COUNSEL**

20 In re:

21 [No Hearing Requested]

22 KS MATTSON PARTNERS, LP,

23 Debtor.

24
25 ¹ The last four digits of LeFever Mattson's tax identification number are 7537. The last four
26 digits of the tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's
27 address for service is c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The
28 address for service on LeFever Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus
Heights, CA 9562. Due to the large number of debtor entities in these Chapter 11 Cases, a
complete list of the Debtors and the last four digits of their federal tax identification numbers is
not provided herein. A complete list of such information may be obtained on the website of the
Debtors' claims and noticing agent at <https://veritaglobal.net/LM>.

1 I, Josh H. Escovedo, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

2 1. I am a shareholder of Buchalter, A Professional Corporation (“Buchalter”), special
 3 litigation counsel to LeFever Mattson, a California corporation, and certain of its affiliates,
 4 excluding KSMP, that are the above-captioned debtors and debtors in possession (collectively, the
 5 “Debtors” or “LeFever Mattson Debtors”) in these chapter 11 cases (the “Chapter 11 Cases”).

6 2. I submit this Declaration as a supplement to my declaration dated April 23, 2025
 7 [Dkt. No. 1360] (the “Original Declaration”) in support of the *Application of Debtors for Order*
 8 *Authorizing Employment of Buchalter, a Professional Corporation, as Special Litigation Counsel*
 9 [Dkt. No. 1359] (the “Employment Application”).² On May 7, 2025, the Court entered the *Order*
 10 *Granting Application of Debtors for Order Authorizing Employment of Buchalter, a Professional*
 11 *Corporation, as Special Litigation Counsel* [Dkt. No. 1401] (the “Employment Order”).

12 3. The Employment Order authorized the Debtors to employ Buchalter pursuant to
 13 section 327(e) of the Bankruptcy Code as special litigation counsel in the Benedetti Litigation.

14 4. As anticipated in the Original Declaration, this declaration is submitted to
 15 supplement information disclosed in the Original Declaration; as additional information regarding
 16 parties in interest becomes available, further supplemental declarations will be submitted to the
 17 Court reflecting such amended, supplemented or otherwise modified information.

18 5. Since the filing of the Original Declaration, additional developments in the Chapter
 19 11 Cases require the supplemental disclosures set forth in the following paragraphs.

20 6. Buchalter is representing Select Portfolio Servicing, Inc. (“SPS”) in its response to
 21 certain discovery requests from the official committee of unsecured creditors in these Chapter 11
 22 Cases. SPS is a lender/servicer on various loans secured by 12 properties owned by Debtors
 23 LeFever Mattson, a California corporation, and Valley Oak Investments, LP.

24 7. Buchalter is representing Snegg & Snegg Investments in its potential purchase of
 25 the real property located at 4950-4970 Allison Pkwy, Vacaville, California, which is owned by
 26 Debtor Windscape Apartments, LLC.

27 _____
 28 ² Capitalized terms used but not otherwise defined herein shall have the meanings given to
 them in the Employment Application.

8. I do not believe either of the above representations are adverse to the Debtors or their estates with respect to the matter on which Buchalter has been employed, *i.e.*, the Benedetti Litigation.

9. I will amend or supplement this declaration to the extent I learn that (a) any of the representations herein are incorrect or (b) there is any change of circumstances relating thereto.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed September 12, 2025.

/s/ Josh H. Escovedo

Josh H. Escovedo

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